

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

United States District Court
Southern District of Texas
FILED

NOV 19 2019

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

**JUAN MORENO
OSCAR SERAFIN IBARRA
GERARDO RUIZ**

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§

Criminal No.

M-19-2337

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about October 13, 2019, until on or about October 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MORENO
OSCAR SERAFIN IBARRA
and
GERARDO RUIZ**

did knowingly and intentionally conspire and agree together and with other persons both known and unknown to the Grand Jury, to willfully and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward or otherwise J.L. and D.G. and, in committing or in furtherance of the commission of the offense, did willfully transport J.L. and D.G. in foreign commerce from the State of Texas to the United Mexican States.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the defendants or conspirators, both indicted and unindicted, committed, among others, the following overt acts in the Southern District of Texas:

1. On or about October 13, 2019, **JUAN MORENO (MORENO)** under threats of killing their families did direct J.L. and D.G. to travel on October 14, 2019 to a location in Edinburg, Texas.

2. On or about October 14, 2019, **OSCAR SERAFIN IBARRA (IBARRA)**, **GERARDO RUIZ (RUIZ)**, and **MORENO** met with J.L. and D.G. at a ranch in Edinburg, Texas.
3. On or about October 14, 2019, **IBARRA** and **RUIZ** tied up D.G. and J.L. in order to unlawfully seize and confine D.G. and J.L. and in doing so did instruct D.G. and J.L. either directly or indirectly that they were not free to leave.
4. On or about October 14, 2019, **IBARRA**, **RUIZ**, and **MORENO** did instruct D.G. and J.L. that they had to travel from the United States of America to the United Mexican States.
5. On or about October 15, 2019, **MORENO** rode in a vehicle with D.G. and J.L. that crossed the Donna, Texas Port of Entry traveling southbound leaving the United States of America and entering the United Mexican States.
6. On or about October 15, 2019, **IBARRA** and **RUIZ** escorted the vehicle transporting **MORENO**, D.G., and J.L. that crossed the Donna, Texas Port of Entry traveling southbound leaving the United States of America and entering the United Mexican States.
7. On or about October 15, 2019, **RUIZ** called a co-conspirator to advise that D.G. and J.L. were then in the United Mexican States.
8. From on or about October 15, 2019, to on or about October 30, 2019, co-conspirators in the United Mexican States did continue to unlawfully seize and confine D.G. and J.L. against their will for ransom, reward or otherwise.
9. From on or about October 15, 2019 to on or about October 30, 2019, co-conspirators in the United Mexican States directed D.G. and J.L. to make international phone calls to individuals who could send payment to co-conspirators in exchange for the release of D.G. and J.L.

In violation of Title 18, United States Code, Section 1201(c).

Count Two

From on or about October 13, 2019, and October 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MORENO
OSCAR SERAFIN IBARRA
and
GERARDO RUIZ**

did willfully and unlawfully seize, confine, inveigle, kidnap, abduct, and carry away and hold D.G. for ransom, reward, or otherwise, and, in committing or in furtherance of the commission of the offense, did willfully transport D.G. in foreign commerce from the State of Texas to the United Mexican States.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

Count Three

From on or about October 13, 2019, and October 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MORENO
OSCAR SERAFIN IBARRA
and
GERARDO RUIZ**

did willfully and unlawfully seize, confine, inveigle, kidnap, abduct, carry away, and hold J.L. for ransom, reward, or otherwise, and, in committing or in furtherance of the commission of the offense, did willfully transport J.L. in foreign commerce from the State of Texas to the United Mexican States.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

A TRUE BILL


~~CORY~~ PERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY


ASSISTANT UNITED STATES ATTORNEY